

MUNGER, TOLLES & OLSON LLP  
GLENN POMERANTZ (SBN 112503)  
TAMERLIN GODLEY (SBN 194507)  
MELINDA E. LEMOINE (SBN 235670)  
ANJAN CHOUDHURY (SBN 236039)  
Glenn.Pomerantz@mto.com  
Tamerlin.Godley@mto.com  
Melinda.LeMoine@mto.com  
Anjan.Choudhury@mto.com  
355 South Grand Avenue  
Thirty-Fifth Floor  
Los Angeles, CA 90071-1560  
Telephone: (213) 683-9100  
Facsimile: (213) 687-3702

Attorneys for Defendant  
WARNER MUSIC GROUP CORP.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

DEBRA SLEDGE, JOAN SLEDGE,  
KATHY SLEDGE LIGHTFOOT and KIM  
SLEDGE ALLEN, jointly d/b/a "SISTER  
SLEDGE"; RONEE BLAKLEY; and  
GARY WRIGHT, on behalf of themselves  
and all others similarly situated,

Plaintiffs,

v.

WARNER MUSIC GROUP CORP.,

Defendant.

CASE NO. 12-CV-0559-RS

**JOINT STATEMENT/STIPULATION AND  
[PROPOSED] SCHEDULING ORDER**

Judge: Hon. Richard Seeborg

1 Plaintiffs in the above captioned consolidated action and Defendant Warner Music Group  
2 Corp. ("WMG") together submit this joint statement/stipulation.

3 On August 31, 2012, this Court granted a stay of the proceedings to allow the parties to  
4 participate in settlement discussions and set a further status conference on March 14, 2013. The  
5 Court instructed the parties to inform the Court as to the status of those settlement discussions on  
6 February 28, 2013. The Court's order provided that if, at the time of the filing of the joint  
7 statement, "the parties agree that further settlement discussions would be fruitful" they could "file  
8 a joint statement/stipulation seeking additional time for further settlement negotiations." Stay  
9 Order at 3.

10 Over the course of the last six months, the parties have diligently participated in  
11 settlement discussions. The parties have exchanged information and analysis to facilitate those  
12 negotiations. They have participated in two full day mediation sessions with the Honorable  
13 Daniel Weinstein (Ret.) and held additional phone conferences with and without the mediator.  
14 Further, the parties are currently scheduled for an in-person settlement meeting on March 6, 2013.  
15 While the parties have not reached a settlement at this juncture, the negotiations are constructive  
16 and progress has been made. All parties are committed to continuing the settlement discussions  
17 at this time.

18 For these reasons, the parties jointly file this statement/stipulation to inform the court that  
19 they believe further settlement discussions would be fruitful and to seek additional time for  
20 continued negotiations.

21 Accordingly, the parties hereby agree and stipulate, subject to the approval of the Court, to  
22 the following:

- 23 1. A further Case Management Conference to be set in 60 days, subject to the  
24 schedule of the Court; ~~and~~ May 2, 2013 at 10:00 a.m.
- 25 2. Fourteen days before the Case Management Conference—or before that date if  
26 Plaintiffs and/or WMG believe that settlement cannot be reached—the parties shall  
27 file a joint statement/stipulation with the Court alerting the Court to the fact that  
28 settlement could not be reached and resetting a schedule for WMG's response to

1 the Amended Complaint (which deadline for WMG's response shall be no sooner  
2 than 30 days from the date of the joint statement) and subsequent dates and  
3 deadlines. In the alternative, if the parties agree that further settlement discussions  
4 would be fruitful, the parties can instead file a joint statement/stipulation seeking  
5 additional time for further settlement negotiations.

6  
7 Dated: February 28, 2013

Respectfully Submitted,

8  
9 By: /s/ Tamerlin J. Godley  
Tamerlin J. Godley  
10 MUNGER, TOLLES & OLSON LLP

11 *Attorneys for Defendant*  
12 *Warner Music Group Corp.*

13 Dated: February 28, 2013

Respectfully Submitted,

14  
15 By: /s/ Daniel L. Warshaw  
Daniel L. Warshaw  
16 PEARSON, SIMON, WARSHAW  
17 & PENNY LLP

18 *Interim Lead Counsel Representative for Plaintiffs\**

19  
20 \* A complete list of the attorneys for Plaintiffs is attached to the Amended Complaint.

21  
22 Filer's Attestation


23 I, Tamerlin J. Godley, am the ECF user whose identification and password are being used  
24 to file this JOINT STATEMENT/STIPULATION AND [PROPOSED] SCHEDULING ORDER.  
25 I hereby attest that the counsel listed above concur in this filing.

26 Dated: February 28, 2013

27 /s/ Tamerlin J. Godley  
Tamerlin J. Godley

PURSUANT TO THIS STIPULATION, IT IS SO ORDERED.

Dated: 2/28/13

  
Honorable Richard Seeborg  
U.S. District Judge